

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GOJO INDUSTRIES, INC.,

Plaintiff,

v.

INNOVATIVE BIODEFENSE, INC., and  
AQUARIUS GLOBAL ENERGY  
PARTNERS, LLC,

Defendants.

Civil Action No. 15-cv-2946 (PAC)

ECF Case

**NOTICE OF MOTION OF DEFENDANT  
INNOVATIVE BIODEFENSE, INC. FOR  
TRANSFER OF VENUE PURSUANT TO  
28 U.S.C. 1404(a)**

Judge: Hon. Paul A. Crotty

Crtrm.: 14C

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE THAT** on a date and time to be designated by the Court, in Courtroom 14-C of the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, Defendant Innovative Biodefense, Inc. (“IBD”) will and hereby does move this Court, pursuant to 28 U.S.C. 1404(a), to transfer this action to the United States District Court for the Central District of California.

This motion is based on this Notice; the accompanying Memorandum of Points and Authorities; the accompanying Declarations of Colette Cozean, Adam K. Kurland, Dan Putalik, Hillery Royer, and Hotan Barough; all of the pleadings, files, and records in this proceeding; all other matters of which the Court may take judicial notice; and any argument or evidence that may be presented to or considered by the Court prior to its ruling.

DATED: June 10, 2015

Respectfully Submitted,

By:



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